

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

JAMESINA CRAWFORD, *et al.*,

Plaintiffs,

vs.

**NEWPORT NEWS
INDUSTRIAL CORPORATION**

Defendant.

Case No. 4:14-cv-00130-AWA-RJK

**PLAINTIFFS' MOTION TO COMPEL
FED. R. CIV. P. 26(e) SUPPLEMENTAL DISCOVERY RESPONSES**

Plaintiffs, by and through their undersigned counsel, respectfully file the instant motion to compel Defendant to supplement incomplete or incorrect discovery responses as required by Federal Rule of Civil Procedure 26(e). For the reasons set forth in the attached memorandum of law, Plaintiffs request Defendant supplement the following Demands: from Plaintiff Crawford's First Set of Interrogatories, Nos. 2, 4, 5, 6 (exhibit C), and Requests for Production of Documents Nos. 2, 4, 5, 6, 8-10, 12, 17, 19, 23, 24, 33, 48, 51, 53, 54, 61, and 67 (exhibit D); from Plaintiff Edouard's First Set of Interrogatories Nos. 3, 4, and 20 (exhibit E), and Requests for Production of Documents Nos. 3¹, 4, 19, 20, 23 and 26 (exhibit E).

As set forth in the memorandum of law, the parties conferred in good faith on multiple occasions but were unable to resolve the instant dispute.

¹ Plaintiffs seek responses to either Interrogatory or Document Demand, for numbers 3 and 4. In other words, if an interrogatory is complete, documents are not also required, or vice versa.

Wherefore, Plaintiffs respectfully request that their motion be granted.

Dated: May 15, 2020

Respectfully Submitted,

By: /s/ James H. Shoemaker, Jr.
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Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2020, I will electronically file the foregoing Motion to Compel with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/ James H. Shoemaker, Jr.
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